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7 Attorneys for Plaintiff
8 **SUN VALLEY FLORAL FARMS, LLC**

9 UNITED STATES DISTRICT COURT
10
11 NORTHERN DISTRICT OF CALIFORNIA

12 **SUN VALLEY FLORAL FARMS, LLC, a**
California Limited Liability Company,

13 Plaintiff,

14 v.

15 **ENNO OUDSHOORN, an individual;**
16 **MIDIPRO, a French Limited Liability**
Company; and **DOES 1-10, inclusive,**

17 Defendants.

Case No. C-06-02296 MHP

STIPULATION AND ~~(PROPOSED)~~
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE AND
RELATED DATES

Original CMC Date: July 24, 2006

Requested New CMC Date:

September 18, 2006

Time: 4:00 p.m.

Courtroom: 15

Before: The Honorable Marilyn Hall Patel

[FILED VIA E-FILING]

1 WHEREAS, pursuant to the Clerk's Notice (Scheduling Case Management Conference in
2 Reassigned Case) dated April 18, 2006, a Case Management Conference was set for Monday
3 July 24, 2006 at 4:00 p.m., with a Joint Case Management Statement due ten days prior to the
4 Conference, on Friday, July 14, 2006;

5 WHEREAS, lead counsel for Plaintiff Sun Valley Floral Farms LLC ("Plaintiff Sun Valley")
6 will be out of the country on July 24, 2006 due to a pre-existing business engagement;

7 WHEREAS, Plaintiff Sun Valley and Defendants Enno Oudshoorn and Midipro
8 ("Defendants") agree to continue the date of the Case Management Conference from Monday,
9 July 24, 2006 at 4:00 p.m. to Monday, September 18, 2006 at 4:00 p.m. to enable lead counsel for
10 Plaintiff Sun Valley to attend the conference;

11 WHEREAS, the Parties further agree upon the following related deadlines:

12 The last day for the Parties to meet and confer pursuant to Fed.R.Civ. P. 26(f) shall be
13 August 25, 2006;

14 The Joint Case Management Conference Statement, Rule 26(f) Discovery Plan and exchange
15 of Initial Disclosures shall be due no later than September 8, 2006;

16 IT IS THEREFORE AGREED UPON AND STIPULATED AS FOLLOWS

17 1. The date of the Case Management Conference is continued from Monday, July 24,
18 2006 at 4:00 p.m. to Monday, September 18, 2006, at 4:00 p.m.

19 2. The last day for the Parties to meet and confer pursuant to Fed.R.Civ. P. 26(f) shall be
20 August 25, 2006;

21 3. The Joint Case Management Conference Statement, Rule 26(f) Report
22 (Discovery Plan) and exchange of Initial Disclosures shall be due no later than September 8, 2006;

23 IT IS SO STIPULATED.

24 Dated: May 19, 2006

Bruce H. Jackson
Christopher Van Gundy
Syma Ahmad
BAKER & MCKENZIE LLP

25 By: 
26 Christopher Van Gundy
27 Attorneys for Plaintiff
28 SUN VALLEY FLORAL FARMS, LLC

1 Dated: May 19, 2006

Ronald S. Kravitz
Mai M. Petersen
LINER YANKELVITZ
SUNSHINE & REGENSTREIF LLP

4 By: 

Mai M. Petersen
Attorneys for Defendants
ENNO OUDSHOORN and MIDIPRO

7 * * * * *

8 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:**

- 9 1. The date of the Case Management Conference is continued from Monday, July 24,
10 2006 at 4:00 p.m. to Monday, September 18, 2006, at 4:00 p.m.
- 11 2. The last day for the Parties to meet and confer pursuant to Fed.R.Civ. P. 26(f) shall be
12 August 25, 2006;
- 13 3. The Joint Case Management Conference Statement, Rule 26(f) Report
14 (Discovery Plan) and exchange of Initial Disclosures shall be due no later than September 8, 2006;

15
16 Dated: May 22, 2006

